

1 Amanda M. Roberts, Esq.
2 State Bar of Nevada No. 9294
2 **ROBERTS STOFFEL FAMILY LAW GROUP**
3 4411 S. Pecos Road
3 Las Vegas, Nevada 89121
4 PH: (702) 474-7007
4 FAX (702) 474-7477
5 EMAIL: efile@lvfamilylaw.com
6 Attorneys for Plaintiffs

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 BERYL NICOLE FOSTER-HENRY, an) Case No: 2:17-cv-01437
10 individual; and DEONNE HENRY, an)
11 individual,)
12 Plaintiffs,) **STIPULATION AND [PROPOSED]**
13 v.) **ORDER TO ENLARGE PLAINTIFF'S**
14 ARMY AND AIR FORCE EXCHANGE) **TIME TO RESPOND TO DEFENDANT'S**
15 SERVICE, ANDREWS AND COMPANY,) **MOTION TO DISMISS**
16 LLC, DEPARTMENT OF DEFENSE;) **[FIRST REQUEST]**
17 UNITED STATE OF AMERICAN EX REL)
18 NELLIS AIR FORCE BASE, UNITED)
19 STATE OF AMERICA EX REL)
20 DEPARTMENT OF THE AIR FORCE,)
21 NELLIS AIR FORCE BASE EXCHANGE;)
22 ARMY AND AIR FORCE EXCHANGES)
23 SERVICES; DEPARTMENT OF DEFENSE.)
24 Defendants.)

25 **IT IS HEREBY STIPULATED** that Plaintiffs' deadline to file a Response to Defendant
26 Andrews and Company, LLC's Motion to Dismiss shall be extended from August 3, 2017 until
27 August 11, 2017;

28 **IT IS FURTHER HEREBY STIPULATED** that this extension of time is being agreed
upon in good faith and not for purposes of delay.

1 **IT IS FURTHER HEREBY STIPULATED** that Plaintiffs need additional time because
2 other named Defendants, who have been served but who have not yet appeared in their case,
3 possess information regarding their relationship with Defendant Andrews and Company, LLC
4 which is relevant, and potentially dispositive, on the issues raised in Defendant Andrews and
5 Company, LLC's Motion to Dismiss. As such, additional time is needed for the Plaintiffs to
6 ascertain whether a Response to Defendant Andrews and Company, LLC's Motion to Dismiss is
7 warranted or whether Plaintiffs will stipulate to voluntarily dismiss Defendant Andrews and
8 Company from this action. The additional Defendants are Army and Air Force Exchange Service,
9 Andrews And Company, LLC, Department Of Defense; United State Of American Ex Rel Nellis
10 Air Force Base, United State Of America Ex Rel Department Of The Air Force, Nellis Air Force
11 Base Exchange; Army And Air Force Exchanges Services; Department Of Defense.
12

13 Dated this 3rd Day of August, 2017

Dated this 3rd Day of August, 2017

14 **ROBERTS STOFFEL FAMILY
15 LAW GROUP**

RAY LEGO AND ASSOCIATES

16 By: /s/Amanda Roberts, Esq.
17 Amanda M. Roberts, Esq.
18 Nevada State Bar No.: 9492
19 4411 So. Pecos Road
Las Vegas, Nevada 89121
Attorney for Plaintiffs

By: /s/ Jennifer Mullin Higgins, Esq.
Jennifer Mullin Higgins, Esq.
Nevada State Bar No.: 7107
7450 Arroyo Crossing Parkway, Suite 250
Las Vegas, Nevada 89113
Attorney for Defendants

20 **ORDER**

21 BASED ON THE STIPULATIONS of the parties herein,

22 IT IS SO ORDERED.

23 Dated this 10th day of August, 2017,


24

RICHARD F. BOULWARE, II
25 United States District Judge
26
27